

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(GREENBELT DIVISION)**

IN RE:)
)
TRUDAH A. HARDING) **Case No. 25-11103 MCR**
) (**Chapter 13**)
Debtor.)
)

OPPOSITION TO DEBTOR'S MOTION TO SELL/REFINANCE

Charity At Its Best (“Creditor”), by and through its undersigned counsel, hereby opposes the Motion Requesting Permission to Refinance / Sale / Obtain Loan on the Real Property Listed Above (the “Motion to Sell/Refinance”) [Doc. 67] filed by Debtor, Trudah A. Harding (“Ms. Harding”) on June 30, 2025, and states as follows:

1. Creditor must oppose the Motion to Sell/Refinance because it is impermissibly vague as filed.
2. The Motion to Sell/Refinance requests authorization for Ms. Harding to “Refinance or Sale[sic] the Real Property listed a[sic] above.” *See* Motion to Sell/Refinance.
3. The Motion to Sell/Refinance references both 13604 Canal Vista Court, Potomac, MD 20854 (the “Potomac Property”) and 619 Allison Street, NW, Washington DC 20011 (the “DC Property”).
4. Thus, it is uncertain as to whether Ms. Harding is requesting to sell the Potomac Property or the DC Property, or if Ms. Harding is requesting the ability to refinance a loan against the Potomac Property or the DC Property.
5. The Creditor specifically objects to any sale of either the Potomac Property or the DC Property, as Ms. Harding has not filed an application to employ a real estate agent related to the sale.

6. Similarly, Ms. Harding has not provided any contract for sale of the Potomac Property or the DC Property, and has not provided any evidence that she is working towards a sale of either property.

7. Further, the Creditor has been granted relief from the automatic stay related to the Potomac Property and intends to move forward with its remedies afforded under the loan documents and under state law. *See Doc. 63.*

8. Therefore, the Creditor respectfully requests that the Motion to Sell/Refinance be denied.

WHEREFORE, the Creditor respectfully requests that this Honorable United States Bankruptcy Court enter an Order denying the Motion to Sell/Refinance, and grant such other and further relief as this Court deems just and proper.

Respectfully submitted,

SHULMAN ROGERS, P.A.

By: /s/ Rebekah F. Paradis
Rebekah F. Paradis (Bar No. 30948)
Benjamin P. Smith (Bar No. 17680)
12505 Park Potomac Avenue, Sixth Floor
Potomac, Maryland 20854
TEL: (301) 230 5257 (Paradis)
(301) 230-5241 (Smith)
FAX: (301) 230-2891
Email: rparadis@shulmanrogers.com
bsmith@shulmanrogers.com
Attorneys for Creditor

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of July, 2025, the following parties received via electronic case filing this **Opposition to Motion to Sell/Refinance** and proposed **Order**:

Daniel M. Press dpress@chung-press.com
Counsel for Debtor

Rebecca A. Herr ecf@ch13md.com
Chapter 13 Trustee

I further certify that on this 8th day of July, 2025, I caused to be mailed by first class mail, postage prepaid, copies of this **Opposition to Motion to Sell/Refinance** and proposed **Order** to the following:

Trudah A. Harding
13604 Canal Vista Court
Potomac, MD 20854
Debtor

/s/ Rebekah F. Paradis
Rebekah F. Paradis